

**IN THE UNITED STATES DISTRICT COURT FOR THE
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

JOHN FULTON,)	Case No. 20-cv-3118
)	
Plaintiff,)	Hon. Joan H. Lefkow
)	District Judge
v.)	
)	Hon. Maria Valdez
ROBERT BARTIK, et al.,)	Magistrate Judge
)	
Defendants.)	JURY TRIAL DEMANDED

ANTHONY MITCHELL,)	Case No. 20-cv-3119
)	
Plaintiff,)	Hon. Joan H. Lefkow
)	District Judge
v.)	
)	Hon. Maria Valdez
ROBERT BARTIK, et al.,)	Magistrate Judge
)	
Defendants.)	JURY TRIAL DEMANDED

**INDIVIDUAL CITY DEFENDANTS' UNOPPOSED MOTION FOR
EXTENSION OF TIME TO FILE PREFTRIAL FILINGS AND MOTIONS *IN LIMINE***

Defendants Robert Bartik, John Zalatoris, James Breen, Edward Winstead, Joseph Struck, Stephen Franko, and Robert Girardi ("Individual City Defendants"), by and through their undersigned counsel, hereby submit this unopposed motion to extend the time by which the parties must file all pretrial filings and motions *in limine*, and in support thereof state as follows:

1. On October 10, 2024, the Court ordered the parties to file proposed voir dire, proposed jury instructions, proposed verdict form, list of all witnesses to be called, exhibit list, any stipulations, a brief agreed case statement, and any motions *in limine* by December 4, 2024. Dkt. No. 264.

2. On agreement by the parties, the Court resent the deadline for all pretrial filings and

motions *in limine* to December 9, 2024. Dkt. No. 270.

3. The final pretrial conference is set for December 18, 2024 at 1:30 p.m. Dkt. No. 264.

4. Due to counsel for Individual City Defendants having expert discovery deadlines and related briefing in a separate civil case, Individual City Defendants require a brief extension to submit their pretrial filings, including *Daubert* motions, and motions *in limine*.

5. As such, Individual City Defendants request the Court allow a three-day extension to file all pretrial filings and motions *in limine* by December 12, 2024.

6. Individual City Defendants' counsel contacted Plaintiffs' counsel on December 4, 2024 regarding this motion, and Plaintiffs do not have any objection to an extension.

7. This motion is not made for any improper purpose or delay.

WHEREFORE, Individual City Defendants respectfully request that this Court enter an order granting the parties until December 12, 2024 to file all pretrial filings, *Daubert* motions, and motions *in limine*.

Respectfully submitted,

/s/Natalie Y. Adeeyo

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CERTIFICATE OF SERVICE

I, Natalie Adeeyo, an attorney, hereby certify that I electronically filed the foregoing document with the Clerk of the Court using the CM/ECF system, which sent electronic notification of the filing on the same day to all counsel of record.

/s/ Natalie Adeeyo